

Irene Karbelashvili, State Bar Number 232223
LAW OFFICE OF IRENE KARBELASHVILI
12 South First Street, Suite 413
San Jose, CA 95113
Telephone: (408) 295-0137
Fax: (408) 295-0142

Attorney for JOHN RODGERS, Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JOHN RODGERS)	Case No. 3:14-cv-03854-LB
Plaintiff,)	
)	<i>Civil Rights</i>
vs.)	
)	PLAINTIFF'S REQUEST AND
KEVIN S. YOO, an individual, and DOES)	[PROPOSED] ORDER OF
1-10 inclusive,)	DISMISSAL WITH PREJUDICE
Defendants.)	
)	
)	

Pursuant to Fed. R. Civ. P. 41(a)(2) Plaintiff John Rodgers ("Plaintiff") hereby requests that the Court dismiss Plaintiff's Complaint against Defendant Kevin S. Yoo ("Defendant") with prejudice.

The parties attended a court sponsored mediation on August 14, 2015 and settled the matter in its entirety. Subsequently, Plaintiff and Defendant entered into a formal settlement agreement. Plaintiff provided Defendant with a draft stipulation and proposed order of dismissal of Plaintiff's complaint with prejudice. Plaintiff received no response from Defendant's counsel and has therefore been unable to obtain a signed stipulation from Defendant. In order to comply with the November 5th, 2015 deadline (Docket No. 20), Plaintiff respectfully requests that the Court dismiss Plaintiff's complaint with prejudice.

Dated: November 5, 2015

/s/ Irene Karbelashvili
By: Irene Karbelashvili
Attorney for Plaintiff
JOHN RODGERS

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that:

1. Plaintiff's Complaint in the above-entitled action shall be dismissed with prejudice as against Defendant KEVIN S. YOO.
2. The Court is to retain jurisdiction to enforce the terms of the parties' SETTLEMENT AGREEMENT AND RELEASE OF ALL CLAIMS.
3. Each Party shall bear its own costs and fees in this action.

Dated: November 6, 2015



Honorable Laurel Beeler, United States
Magistrate Judge